

**P. ANDREW McSTAY, JR.**, OSB 033997

andymcstay@dwt.com

**WILLIAM D. MINER**, OSB 043636

billminer@dwt.com

**DAVIS WRIGHT TREMAINE LLP**

560 SW Tenth Avenue, Suite 700

Portland, OR 97205

Tel: (503) 241-2300

**MARCIA ROBINSON LOWRY** (*pro hac vice*)

mlowry@abetterchildhood.org

**ANASTASIA BENEDETTO** (*pro hac vice*)

abenedetto@abetterchildhood.org

**LINDSAY GUS** (*pro hac vice*)

lgus@abetterchildhood.org

**A BETTER CHILDHOOD**

355 Lexington Avenue, Floor 16

New York, NY 10017

Tel: (646) 795-4456

**EMILY COOPER**, OSB 182254

ecooper@droregon.org

**THOMAS STENSON**, OSB 152894

tstenson@droregon.org

**DISABILITY RIGHTS OREGON**

511 SW Tenth Avenue, Suite 200

Portland, OR 97205

Tel: (503) 243-2081

**STEVEN RIZZO**, OSB 840853

srizzo@rizzopc.com

**MARY D. SKJELSET**, OSB 075840

mskjelset@rizzopc.com

**RIZZO BOSWORTH ERAUT PC**

1300 SW Sixth Avenue, Suite 330

Portland, OR 97201

Tel: (503) 229-1819

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

WYATT B., *et al.*,

Plaintiffs,

v.

TINA KOTEK, *et al.*,

Defendants.

Case No. 6:19-cv-00556-AA

**PLAINTIFFS' EXHIBIT LIST**

Plaintiffs submit the following proposed exhibits for trial. Plaintiffs reserve the right to supplement and/or amend this list due to ongoing discovery efforts in this case, including but not limited to Defendants' production of documents pursuant to the Court's March 20, 2024 Order (ECF 343) and remaining expert depositions.

Ex.	Description	Bates	Id.	Am.
1	2/5/2024 Memorandum from Fariborz Pakseresht to Senate Human Services Committee re Responses to questions regarding Child Welfare contractors, temporary lodging and litigation	Wyatt_DHS_4671249		
2	Expert Report of Patricia Rideout and Dr. Sue Steib 11/30/2019			
3	Amended Expert Report of Patricia Rideout and Dr. Sue Steib 2/2/2024			
4	Expert Rebuttal Report of Patricia Rideout and Dr. Sue Steib 3/1/2024			
5	Expert Report of Dr. Angelique Day 11/27/2019			
6	Expert Report of Dr. Angelique Day 12/15/2023			
7	Expert Report of Dr. Anne Farina 12/15/2023			
8	Expert Rebuttal Report of Dr. Anne Farina 3/1/2024			
9	Expert Rebuttal Report of Albyn Jones 3/1/2024			
10	Expert Report of Alan M. Puckett 11/28/2019			

11	Expert Report of Dr. Bianca Wilson 12/1/2019			
12	Wyatt B. Complaint	Dkt. 1		
13	Plaintiffs' 15th RFP			
14	Plaintiffs' 16th RFP			
15	12/7/2021 Email exchange re CANS information			
16	12/8/2021 Email exchange re OR CANS information			
17	12/8/2021 Email exchange re OR CANS information			
18	12/9/2021 Email exchange re OR CANS Information			
19	Department of Administrative Services Insurance Fund Presentation 2/14/2024			
20	2023 Public Knowledge Report: Oregon Child Welfare Review Draft Assessment Findings Report 12/15/2024			
21	Public Knowledge Focus Group Notes	Wyatt_PK0004085		
22	Stacey Moss 3/18/2024 Deposition Transcript att: Exs. 2 & 4 to Stacey Moss Deposition <sup>1</sup>			
23	Public Knowledge Interview Notes	Wyatt_PK0004086		
24	CFSR Self-Assessments - Statewide Chart			
25	D10 2018 CFSR Charts	Wyatt_DHS_2697816		
26	D10 2019 CFSR Charts	Wyatt_DHS_2699255		
27	D10 2020 CFSR Charts	Wyatt_DHS_2699632		
28	D10 2021 CFSR Charts	Wyatt_DHS_2709616		
29	D10 2022 CFSR Charts	Wyatt_DHS_2966390		
30	D10 2023 CFSR Charts	Wyatt_DHS_4675487		
31	Number of Children in Foster Care or being Served In Home on April 1, 2022 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2731325		
2	Number of Children in Foster Care or being Served In Home on Jan. 1, 2022 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2731231		
33	Number of Children in Foster Care or being Served In Home on April 1, 2021	Wyatt_DHS_2731277		

<sup>1</sup> Because the exhibits were numerous and sent electronically, the parties agreed on the record that the exhibits were part of the Moss deposition.

	by Worker Assignment, Worker County, Worker Role, and Worker Type			
34	Number of Children in Foster Care or being Served In Home on Jan 1., 2021 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2731301		
35	2018 Oregon Secretary of State Audit of ODHS	Wyatt_DHS_0059767		
36	OR Secretary of State Audit of ODHS 2019: Recommendation Follow-up Report: DHS Has Made Important Improvements, but Extensive Work Remains to Ensure Child Safety	Wyatt_DHS_0061108		
37	D1 Clatsop Debrief Summary Oct 2023	Wyatt_DHS_4675967		
38	D1 Columbia Debrief Summary Oct 2023	Wyatt_DHS_4675956		
39	D2 Alberta Debrief Summary Sep 2023	Wyatt_DHS_4675879		
40	D2 E Multnomah Debrief Summary Sep 2023	Wyatt_DHS_4675861		
41	D2 Gresham Debrief Summary Jan 2023	Wyatt_DHS_4675342		
42	D2 Midtown Debrief Summary Jan 2023	Wyatt_DHS_4675349		
43	D3 Marion Debrief Summary Apr 2023	Wyatt_DHS_4675445		
44	D3 Polk Debrief Summary Apr 2023	Wyatt_DHS_4675472		
45	D3 Yamhill Debrief Summary Apr 2023	Wyatt_DHS_4675484		
46	D4 Benton Debrief Summary Aug 2023	Wyatt_DHS_4675758		
47	D4 Lincoln Debrief Summary Aug 2023	Wyatt_DHS_4675721		
48	D4 Linn Debrief Summary Aug 2023	Wyatt_DHS_4675737		
49	D5 Lane Debrief Summary Feb-Mar 2023	Wyatt_DHS_4675393		
50	D6 Douglas Debrief Summary Jul2023	Wyatt_DHS_4675666		
51	D7 Coos-Curry Debrief Summary May 2023	Wyatt_DHS_4675512		
52	D8 Jackson Debrief Summary Jun 2023	Wyatt_DHS_4675547		
53	D8 Josephine Debrief Summary Jun 2023	Wyatt_DHS_4675538		
54	D9 Debrief Summary Nov 2023	Wyatt_DHS_4676107		
55	D10 Debrief Summary May 2023	Wyatt_DHS_4675493		
56	D10 Warm Springs Debrief Summary May 2023	Wyatt_DHS_4675592		
7	D11 Klamath Debrief Summary Aug 2023	Wyatt_DHS_4675749		
58	D12 Umatilla Debrief Summary Jul 2023	Wyatt_DHS_4675624		

59	D13 Baker Debrief Summary Jul 2023	Wyatt_DHS_4675615		
60	D14 Debrief Summary Oct 2023	Wyatt_DHS_4676118		
61	D15 Clackamas Debrief Summary Nov 2023	Wyatt_DHS_4676092		
62	D16 Washington Debrief Summary Dec 2023	Wyatt_DHS_4676253		
63	D2 Gresham Debrief Summary Jan 2022	Wyatt_DHS_2722208		
64	D3 Polk Debrief Summary Apr 2022	Wyatt_DHS_4674948		
65	Grand Ronde Debrief Summary Apr 2022	Wyatt_DHS_4674967		
66	D7 Coos-Curry Debrief Summary May 2022	Wyatt_DHS_4674993		
67	D10 Crook Debrief Summary May 2022	Wyatt_DHS_4675009		
68	D8 Josephine Debrief Summary Jun 2022	Wyatt_DHS_4675039		
69	D12 Umatilla Debrief Summary Jul 2022	Wyatt_DHS_4675051		
70	D13 Baker Debrief Summary Jul 2022	Wyatt_DHS_4675064		
71	D6 Douglas Debrief Summary Jul 2022	Wyatt_DHS_4675083		
72	D11 Klamath Debrief Summary Aug 2022	Wyatt_DHS_4675106		
73	D4 Benton Debrief Summary Aug 2022	Wyatt_DHS_4675125		
74	D2 Alberta Debrief Summary Sep 2022	Wyatt_DHS_4675151		
75	D2 E Multnomah Debrief Summary Sep 2022	Wyatt_DHS_4675162		
76	D14 Grant Debrief Summary Oct 2022	Wyatt_DHS_4675182		
77	D14 Malheur County Debrief Summary Oc. 2022	Wyatt_DHS_2984149		
78	D9 Hood River Debrief Summary Nov 2022	Wyatt_DHS_4675207		
79	D15 Clackamas Debrief Summary Nov 2022	Wyatt_DHS_4675230		
80	D16 Washington Debrief Summary Dec 2022	Wyatt_DHS_4675296		
81	D2 Midtown Debrief Summary Ja 2022	Wyatt_DHS_4676565		
82	D5 Lane Debrief Summary Feb.- Mar2022	Wyatt_DHS_4676578		
83	D8 Jackson Debrief Summary Jun 2022	Wyatt_DHS_4676614		
84	D1 Clatsop Debrief Summary Oct 2022	Wyatt_DHS_4676633		
85	D1 Clatsop & Tillamook Summary Oct 2022	Wyatt_DHS_3070630		
86	8/10/2018 Email from Rosa Klein to Kate Brown et al.	Wyatt_DHS_2677920		
87	Foster Care Recruitment & Retention	Wyatt_DHS_0700335		
88	8/26/2019 Email from Fariborz	Wyatt_DHS_2269185		

	Pakseresht to SEIU 503			
89	Oregon Department of Human Services, Child Welfare Progress Report	Wyatt_DHS_0059477		
90	6/28/2021 Email exchange between Megan Brazo-Erickson to RJG, Lacey Andresen, et al.	Wyatt_DHS_2921337		
91	1/5/2022 Email exchange between April Munks and Lacey Andresen	Wyatt_DHS_2943220		
92	1/26/2022 Email exchange between Timothy Gillette and Eric Moore, et al.	Wyatt_DHS_4418330		
93	4/5/2022 Email exchange between Diepen-Hedyat Anandi and Tova Woyciechowicz	Wyatt_DHS_2958418		
94	6/22/22 Email exchange between April Munks and Lacey Andresen, Aprille Flint-Gerner, et al.	Wyatt_DHS_2964709		
95	Oregon Caseload Ratio Standards Feb 3, 2022	Wyatt_DHS_2745840		
96	11/21/2022 Email exchange between Lacey Andresen, Amber McClelland, et al.	Wyatt_DHS_2983281		
97	June 19, 2019 Email exchange between Rosa Klein and Mary Moller, Berri Lesli, et al.	Wyatt_DHS_0774226		
98	9/20/2019 Email exchange between Kim Lorz and Morton McKenzie, Lisa Lewis, et al.	Wyatt_DHS_2186384		
99	8/23/2019 Email exchange between Fariborz Pakseresht and Liesl Wendt	Wyatt_DHS_0792852		
100	2/12/2020 Email exchange between RJG, Jana Mclellan, Fariborz, Deena Loughary, Lacey Andresen, et al.	Wyatt_DHS_2799968		
101	1/6/2022 Email exchange between Kevin Marks Hess and Kristin Khamnohack, Lacey Andresen, et al.	Wyatt_DHS_2944017		
102	2/17/22 Email exchange between Lacey Andresen and April Munks, Rebecca Jones Gaston, et al.	Wyatt_DHS_2949984		
103	2/14/22 Email exchange between April Munks and Cherly Baldomarolucas et al.	Wyatt_DHS_3958043		
104	5/13/2022 Email exchange between Lacey Andresen, Timothy Gillette, RJG, Aprille Flint-Gerner, et al	Wyatt_DHS_3027680		
105	Email exchange between Lacey Andresen, RJG, April Munks, et al.	Wyatt_DHS_3027752		

106	Agency Budget Request Section 2 2023-2025	Wyatt_DHS_2732398		
107	Email from Darin Mancuso to Fariborz Pakseresht, Deena Loughary, et al.	Wyatt_DHS_3236433		
108	Temporary Lodging Progress Report Jan 3, 2023	Wyatt_DHS_2794338		
109	1/4/2023 Email exchange between Fariborz Pakseresht, Lacey Andresen, et al.	Wyatt_DHS_2794337		
110	1/13/2023 Email exchange between Laura Winchester and Susana Dietrich	Wyatt_DHS_3202356		
111	1/4/2023 Email exchange between Darin Mancuso, Deena Loughary	Wyatt_DHS_3236412		
112	Percentage of adults receiving required monthly face-to-face visits	Wyatt_DHS_2723132		
113	Caseworker visits with adults	Wyatt_DHS_2758337		
114	ODHS CFSP 2020-2024			
115	3/29/2021 Email exchange between Lacey Andresen, Lee Brown, et al.	Wyatt_DHS_2903521		
116	7/27/2021 Email exchange between Lacey Andresen, and field program managers	Wyatt_DHS_2924207		
117	12/1/2021 Email exchange between Lacey Andresen and field program managers	Wyatt_DHS_2939270		
118	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Wyatt_DHS_2722468		
119	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Wyatt_DHS_2730545		
120	ODHS CW Progress Report Mar 2024			
121	Invoices for Dynamic Life Planning Sessions	Wyatt_DHS_4674558; Wyatt_DHS_4674708		
122	11/14/2023 Email exchange between Michelle Pfeiffer and Lacey Andresen et al.	Wyatt_DHS_4674721; Wyatt_DHS_4674731		
123	12/5/2023 OPB Article			
124	2/29/2024 OPB Article			
125	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.	Wyatt_DHS_4674585		
126	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.	Wyatt_DHS_4674727		
127	DHS Child Welfare After Action			

	Report: A Review of Contracting with Dynamic Life			
128	Sensitive Issue Reports Compilation			
129	Summary of temporary lodging settlement agreement	Wyatt_DHS_0839005		
130	Slide deck from 8/15/2018 on temporary lodging and the settlement	Wyatt_DHS_0213355		
131	Datasheet Count of Children/Young Adults in Foster Care by Lifetime Temporary Lodging occasions through the end of the period	Wyatt_DHS_2758330		
132	Datasheet Children/Young Adults exiting from foster care during the reporting period by count of total occasions during the foster care episode	Wyatt_DHS_2758322		
133	Datasheet on days spent in temporary lodging for those in custody on 1/31/22	Wyatt_DHS_4564509		
134	November 2022 Temporary Lodging report	Wyatt_DHS_2794350		
135	November/December 2022 Temporary Lodging Report	Wyatt_DHS_2794354		
136	Letter to Judge McShane re Temporary Lodging numbers	Wyatt_DHS_4482788 - Wyatt_DHS_4614779		
137	Temporary Lodging Report to McShane	Wyatt_DHS_4478984		
138	Temporary Lodging Report to McShane	Wyatt_DHS_2794216		
139	Temporary Lodging Report to McShane	Wyatt_DHS_2959125		
140	Temporary Lodging Report to McShane	Wyatt_DHS_3070607		
141	Temporary Lodging Report to McShane	Wyatt_DHS_4662788		
142	Temporary Lodging Report to McShane	Wyatt_DHS_4662518		
143	Special Master's Recommendations for Addressing Temporary Lodging	Wyatt_DHS_4671218		
144	1/19/2018 Email exchange between Laurie Theororou, Nancy Allen, et al.	Wyatt_DHS_0361847		
145	1/26/2018 Email exchange between Glenda Marshall, Nancy Allen, et al.	Wyatt_DHS_0363606		
146	ORRAI Capacity Needs Report	Wyatt_DHS_0132365		
147	Email exchange between Marty Herbert, Nancy Allen, et al.	Wyatt_DHS_1115309		
148	7/26/2019 Email from Jake Sunderland to Jana Mclellan et al.	Wyatt_DHS_0502374		
149	9/3/2019 Email from Katrina Husbands to Kimberly Young	Wyatt_DHS_2106959		
150	9/23/2019 Email from Angela Leet to Sara Fox	Wyatt_DHS_2488463		
151	11/1/2019 Email exchange with all staff	Wyatt_DHS_1159402		



152	12/4/2019 Email exchange between Glenda Marshall, Angela Leet, et al.	Wyatt_DHS_0226697		
153	Secretary of State OHA Audit Mental Health Treatment			
154	Datasheet ODHS Certified Resource Homes on the first day of the quarter and those with no children placed with provider in the previous 6 months	Wyatt_DHS_3064029		
155	Datasheet ODHS Certified Homes on the first day of the period and those with no children placed in the home	Wyatt_DHS_3064030		
156	Datasheet CM.09 Placement in Same or Adjoining County-of those in care	Wyatt_DHS_4564372		
157	BRS Beds PowerPoint and datasheet	Wyatt_DHS_2964695; Wyatt_DHS_2964696		
158	6/22/2022 Email exchange between Sarah Fox, Lacey Andresen, et al.	Wyatt_DHS_2964693		
159	Datasheet on capacity overrides	Wyatt_DHS_2722938		
160	Statewide Quarterly Data Report 2020-2022	Wyatt_DHS_2723058		
161	All DHS certified providers open first day of month between 2021 and 2022	Wyatt_DHS_2725350		
162	Placement map	Wyatt_DHS_2964698		
163	HB 2086 (2021) Report: Intensive Behavioral Health Treatment Services for Children and Adolescents: Capacity and Demand	Wyatt_DHS_2754777		
164	7/15/2018 Email exchange between Marilyn Jones, Shannon Biteng, et al.	Wyatt_DHS_0260455		
165	5/17/2019 Email exchange between Sarah Fox, Rosa Klein, et al.	Wyatt_DHS_0477192		
166	6/12/2019 Email exchange between Senator Gelser, Rosa Klein, et al.	Wyatt_DHS_0485186		
167	6/4/2019 Email from David Schmidt to Christy Sinatra	Wyatt_DHS_0884589		
168	7/27/2022 Email exchange between Senator Gelser, Fariborz Pakseresht, et al.	Wyatt_DHS_4651986; Wyatt_DHS_4427612		
169	Datasheet on congregate care placements	Wyatt_DHS_4564517		
170	Datasheet on congregate care placements	Wyatt_DHS_4564518		
171	Datasheet Children in Foster Care on first day of quarter	Wyatt_DHS_4467888		
172	Datasheet on children entering care each year	Wyatt_DHS_2784630		

173	Datasheet on victims of Abuse while in foster care	Wyatt_DHS_2784632		
174	Datasheet on Children in Foster Care on first day of quarter	Wyatt_DHS_4467889		
175	2021 CW Data Book	Wyatt_DHS_2733259		
176	ODHS data	Wyatt_DHS_2721498		
177	Oregon Data	Wyatt_ABC_004209		
178	CFSR Data Profile R3 August 2022	Wyatt_DHS_2750400		
179	CFSR Data Profile R3 February 2022	Wyatt_DHS_2745879		
180	2023 Oregon Profile Casey Family	Wyatt_ABC_003599		
181	NYTD data snapshot Oregon 2016-2020	Wyatt_DHS_2709583		
182	NYTD data snapshot Oregon 2017-2021			
183	Email exchange between Lacey Andresen, Sherrelle Jackson, et al	Wyatt_DHS_2985918; Wyatt_DHS_2986212		
184	Spreadsheet with Interview Output	Wyatt_PK0004110		
185	Chaffee graduation rates	Wyatt_DHS_2709526		
186	4/15/2021 Email exchange between Elisa Deserano, Lacey Andresen, et al.	Wyatt_DHS_2907461		
187	2/7/2023 ACF letter	Wyatt_DHS_2758034		
188	Call data	Wyatt_DHS_2745876		
189	Call wait-time data	Wyatt_DHS_2745877		
190	Datasheet on founded CPS Assessments	Wyatt_DHS_2758319		
191	Data on overdue Assessments	Wyatt_DHS_2722939		
192	2024 APSR	Wyatt_DHS_4467023		
193	May 2022 CPS Fidelity Statewide Report	Wyatt_DHS_4669518		
194	ODHS 2023-25 POP Child Safety	Wyatt_DHS_2757487		
195	Planning for Reunification and Meeting Expected Outcomes	Wyatt_DHS_0089091		
196	7/12/2019 Email exchange between Tami Kane-Suleiman and Greg Westbrooks, et al.	Wyatt_DHS_2206539		
197	8/27/2019 Email exchange between Sen Gelser, Remmal Nivens, et al.	Wyatt_DHS_2487323		
198	Oregon Child Integrated Dataset	Wyatt_DHS_2761868		
199	Email exchange between Rebecca Jones-Gaston, Fariborz, et al.	Wyatt_DHS_2761866		
200	9/28/2021 Email exchange between Fariborz, Lacey Andresen, et al.	Wyatt_DHS_2932457		
201	2/4/2022 Email exchange between Sen Gelser, Lacey Andresen, et al.	Wyatt_DHS_3224948		
202	CIRT datasheet	Wyatt_DHS_4564365		
203	CFSR 3	Wyatt_DHS_2745843		
204	ODHS Child Welfare Dashboard			
205	Article: Oregon DHS report admits missteps in foster kid care, but			

	lawmaker says that's not enough			
206	Service Delivery Data Report Midtown Child Welfare 2024	Wyatt_DHS_4680072		
207	Absence of repeated maltreatment chart	Wyatt_DHS_2972576 - Wyatt_DHS_2972582		
208	8/23/2022 Email exchange between Lacey Andresen, Cathy Iles, et al.	Wyatt_DHS_2972574		
209	Datasheet on foster care visits	Wyatt_DHS_2722934		
210	10/31/2019 Email from David Schmidt to Jeff Pinelli et al	Wyatt_DHS_2302105		
211	Caseload optimization for improved child outcomes and workload equity	Wyatt_DHS_4413766		
212	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al	Wyatt_DHS_4413713		
213	Datasheet on discharges	Wyatt_DHS_2758323		
214	Datasheet on time in care	Wyatt_DHS_2758334		
215	OR CFSR Round 3 - PIP	Wyatt_DHS_2723163		
216	Chart on disparities in length of stay	Wyatt_DHS_2972580		
217	8/23/2022 Email exchange between Cathy Iles, Alex Trotter et al.	Wyatt_DHS_2972574		
218	AFCARS Report Oregon FY 2022			
219	AFCARS Report Oregon FY 2021	Wyatt_ABC_003572		
220	Datasheet on length of stay	Wyatt_DHS_4467884		
221	2020-2024 Child and Family Services Plan			
222	2021 ODHS APSR	Wyatt_DHS_2690337		
223	5/20/2020 Email exchange between Rosa Klein and Kate Brown et al.	Wyatt_DHS_2762002		
224	Chart on timely adoptions	Wyatt_DHS_2972578		
225	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al.	Wyatt_DHS_4413713		
226	Datasheet on adoption	Wyatt_DHS_4564370		
227	Adoption Datasheet	Wyatt_DHS_2758335		
228	Datasheet on trial home visits	Wyatt_DHS_2758336		
229	Chart on foster care population	Wyatt_DHS_0060317		
230	Chart on placement moves	Wyatt_DHS_2832829		
231	7/31/2020 Email exchange between Josh Miller to Lacey Andresen et al.	Wyatt_DHS_2832826		
232	Datasheet on exits	Wyatt_DHS_2758321		
233	Datasheet on placements	Wyatt_DHS_2784631		
234	Oregon CFSR 4 Data Profile Children's Bureau	Wyatt_DHS_2750402		
235	Datasheet on placements	Wyatt_DHS_4564511		
236	4/23/2018 Email exchange between Darin Mancuso and Bridget Byfield et	Wyatt_DHS_2604143		

	al.			
237	Seiler Memo- Legislative Update Notes	Wyatt_DHS_0774399		
238	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children	Wyatt_DHS_0130798		
239	8/2/2019 Email exchange between David Schmidt and Darin Mancuso et al	Wyatt_DHS_2300138		
240	ORRAI Child Welfare Research Agenda: Service Array Analysis Draft	Wyatt_DHS_0126721		
241	12/28/2022 Letter from Rebecca Jones Gaston to Kate Brown	Wyatt_DHS_2794312		
242	CP3-Children's Public Private Partnership	Wyatt_DHS_2987073		
243	1/18/2023 Email exchange between Tim Gillette to Lacey Andresen, Aprille Flint-Gerner et al.	Wyatt_DHS_2986994		
244	Greater Oregon Behavioral Health Inc. - Oregon Kinship Navigator	Wyatt_DHS_2987124		
245	2020 Secretary of State Audit	Wyatt_DHS_2675792		
246	1/11/2023 Email exchange between Deena Loughary, Sarah Greenwood et al	Wyatt_DHS_3236563		
247	9/25/2019 Email exchange between Jake Sunderland and Sara Fox	Wyatt_DHS_2068395		
248	6/14/2022 Email with Sarah Fox et al.	Wyatt_DHS_3182718		
249	3/17/2022 Email with Sarah Fox et al.	Wyatt_DHS_3170539		
250	6/23/2022 Email with Sarah Fox et al.	Wyatt_DHS_2964794		
251	9/26/2022 Email with Sarah Fox et al.	Wyatt_DHS_4504093		
252	OTIS investigation of abuse	Wyatt_DHS_4503757		
253	OTIS investigation of abuse	Wyatt_DHS_4503998		
254	9/21/2022 Email with Sarah Fox et al.	Wyatt_DHS_4503997		
255	10/7/2022 Email with Burke Belit et al.	Wyatt_DHS_3068830		
256	1/5/2022 Email with Burke Belit et al.	Wyatt_DHS_2943652		
257	9/5/2022 Email with Fariborz Pakseresht et al.	Wyatt_DHS_2977731		
258	2/21/2023 Email exchange between Nathan Webber, Gina Zintz et al.	Wyatt_DHS_4671362		
259	10/10/2023 Email with Lori McClure et al.	Wyatt_DHS_4671357		
260	7/20/2023 Email with Tom VanderVeen et al.	Wyatt_DHS_4671303		
261	5/24/2022 Email exchange between Rose Cokelly, Katrina Husbands, et al.	Wyatt_DHS_4619873		
262	ORRAI Report	Wyatt_DHS_4483407		
263	Findings letter from USDHHS	Wyatt_DHS_4588511		
264	ORRAI Report Douglas County Achieving Permanency	Wyatt_DHS_2945779		

265	5/22/2022 Email with Rebecca Jones Gaston et al	Wyatt_DHS_3028489		
266	CRB CAPTA report	Wyatt_DHS_2962366		
267	Datasheet on temporary lodging	Wyatt_DHS_3738109		
268	3/22/2022 Email with Garth Taft et al.	Wyatt_DHS_3738108		
269	9/14/2022 Email from Stacey Loboy to Sarah Fox et al.	Wyatt_DHS_4503751		
270	9/16/2022 Email exchange betweenh Sara Fox, Billy Cordero, et al.	Wyatt_DHS_3192447		
271	Admission Denial Reasons	Wyatt_DHS_3194630		
272	BRS Program Review	Wyatt_DHS_3194633		
273	Datasheet on BRS Placements	Wyatt_DHS_3176415		
274	1/1/2022 Email exchange between Fariborz Pakseresht, John Kitzhaber, et al.	Wyatt_DHS_4418775		
275	Dynamic Service Capacity	Wyatt_DHS_3191710		
276	4/27/2021 Email exchange between Rebecca Jones Gaston, Sarah Fox, et al.	Wyatt_DHS_2909136		
277	DHS/OHA report Oregon's Child, Youth & Family Continuum of Care	Wyatt_DHS_1721029		
278	Oregon Council of Behavioral Health Statement and Recommendations	Wyatt_DHS_2778052		
279	Addressing the Current Crisis in the Children's Behavioral Health System	Wyatt_DHS_2777989		
280	Children's System Letter Response	Wyatt_DHS_2778734		
281	System of Care Plan for Oregon	Wyatt_DHS_2711579		
282	2022 SOCAC Legislative Report	Wyatt_DHS_4564457		
283	12/14/2018 Email exchange between Sarah Fox, Glenda Marshall, et al.	Wyatt_DHS_0646132		
284	4/17/2017 Email exchange between Peter Rosenblatt, Glenda Marshall, et al.	Wyatt_DHS_0930124		
285	1/30/2019 Email exchange between Darin Mancuso, Wendy Leedle, et al.	Wyatt_DHS_2277325		
286	Dynamic Service Capacity	Wyatt_DHS_3192450		
287	Datasheet on BRS capacity	Wyatt_DHS_2956575		
288	Datasheet on temporary lodging	Wyatt_DHS_2956577		
289	2/2022 PRTF Memo	Wyatt_DHS_2956579		
290	3/22/2022 Email exchange between Sarah Fox, Rebecca Jones Gaston et al	Wyatt_DHS_2956567		
291	7/6/2022 Email exchange between Sarah Fox, Lacey Andresen, et al	Wyatt_DHS_2966312		
292	6/22/2022 Email exchange between Rebecca Jones Gaston, Aprille Flint-Gerner, et al	Wyatt_DHS_3030037		

293	10/12/2022 Email exchange between David Schmidt, Ahnjene Boleyn, et al	Wyatt_DHS_3195430		
294	4/14/2022 Email exchange between Darin Mancuso, Sarah Fox, et al.	Wyatt_DHS_3173726		
295	Update on children's PRTF capacity	Wyatt_DHS_2986465		
296	5/24/2022 Email exchange between Jacquelin Gravley, Nancy Allen, et al.	Wyatt_DHS_3180142		
297	10/13/2022 Email exchange between Fariborz Pakseresht, Sarah Fox, et al.	Wyatt_DHS_3195525		
298	6/2/2022 Email exchange between Nancy Allen, Angela Leet, et al.	Wyatt_DHS_3526077		
299	8/19/2022 Email exchange between Jennifer Graffunder, Aprille Flint-Gerner, et al.	Wyatt_DHS_4334954		
300	5/25/2022 Email exchange between Angela Leet, Liesl Wendt, et al.	Wyatt_DHS_4449738		
301	6/3/2022 Email exchange between Angela Leet, Fariborz Pakseresht, et al.	Wyatt_DHS_4450044		
302	6/3/2022 Email exchange between Angela Leet, Liesl Wendt, et al.	Wyatt_DHS_4450071		
303	Temporary Lodging Progress Report 10/2/2023	Wyatt_DHS_4666002		
304	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children	Wyatt_DHS_3604112		
305	11/21/2022 Email exchange between Sara Fox, Rebecca Jones Gaston	Wyatt_DHS_3198056		
306	2/4/2020 Email exchange between Meghan Nielson, Nancy Allen, et al.	Wyatt_DHS_3348471		
307	State of Oregon v. Isaiah Webber, Motion to Modify Release Agreement, 23CR45572 (Marion Co. Ct. Nov. 8, 2023)			
308	State of Oregon v. Isaiah Webber, Information, 23CR45572 (Marion Co. Ct. Sept. 19, 2023)			
309	Univ. of Kansas ROM Child Welfare Data			
310	2016 Public Knowledge Report	Wyatt_DHS_4648027		
311	Temporary Lodging Progress Report 2/1/2023	Wyatt_DHS_4663079		
312	2023-06-07 Child-Family BH OHA-SOCAC	Wyatt_DHS_4466731		

313	Temporary Lodging Presentation 9/18/2023	Wyatt_DHS_4665951		
314	6/15/2021 Email exchange between Simon Fulford, Lacey Andresen, et al.	Wyatt_DHS_3142392		
315	1/19/2022 Email exchange between Lacey Andresen, Chere Lefore, et al.	Wyatt_DHS_2945164		
316	Comprehensive Statewide Plan to Prevent Child Maltreatment Fatalities April 2022	Wyatt_DHS_2747069		
317	DHS Pilot - OHSU Collaboration to support high needs youth	Wyatt_DHS_3202010		
318	Temporary Lodging- Working Steering Committee 10/5/2022	Wyatt_DHS_3852360		
319	12/28/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.	Wyatt_DHS_2985870		
320	12/30/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.	Wyatt_DHS_2985904		
321	Temporary Lodging - Working 2/28/2022	Wyatt_DHS_3737165		
322	Holding Hope: Children's Behavioral Health in Oregon			
323	Compilation of Complaints against ODHS			
324	Statements from Juvenile Attorneys			
325	Withheld maltreatment records responsive to Plaintiffs' 15 <sup>th</sup> RFP, 16 <sup>th</sup> RFP and class representatives			
326	2/28/2024 Stockdale Statement			
327	2/28/2024 Shiprack Statement			
328	2/28/2024 Ponting, Maupin Statements			
329	2/28/2024 Montgomery Statement			
330	JM – Deposition of Dawn Hunter, 6.3.22			
331	JM – Deposition of Dawn Hunter, 7.15.22			
332	JM – Deposition of Dawn Hunter, 10.13.23			
333	JM – Deposition of Desta Walsh			
334	JM – Deposition of Michelle Pfeiffer			
335	JM – Deposition of Melanie Parent			
336	JM – Deposition of Michael John Payne			
337	JM - Deposition of Lacey Andresen			



338	JM - Deposition of Stacey Ayers, 5/16/22			
339	JM - Deposition of Stacey Ayers, 12/01/21			
340	JM - Deposition of Billy Cordero			
341	JM - Deposition of Stacey Daeschner			
342	JM - Deposition of Kevin George			
343	JM Ex. 26: Miller Cert file (0015292-0016260) - deduped (Corrected)			
344	JM Ex. 28: OR-Kids Provider NOTES			
345	JM Ex. 32: Certification Emails			
346	JM Ex. 34: JM-PROD-0016452 (3.13.12 Screening Report)			
347	JM Ex. 36: JM Photos			
348	JM Ex. 37: CH - ORKids file (excerpt)			
349	JM Ex. 61: 2016 Final Report – Excerpts			
350	JM Ex. 66: OR SOS – Audit; DHS Responses 02.2020			
351	JM Ex. 78: CPS – Assessment Summary 10.20.13			
352	JM Ex. 81: LH – Case Review Addendum 01.08.14			
353	JM Ex. 99: Email re Out of Home Investigation			
354	JM Ex. 100: DHS Victim Rights Notifications			
355	JM Ex. 110: AS, JM – Email Correspondence			
356	JM Ex. 118: AS, JM Email Correspondence			
357	JM Ex. 245: RL - Emails (All)			
358	JM Ex. 289: Parent – Org Charts			
359	JM Ex. 290: OR SOS DHS Audit 01.2018			
360	JM Ex. 291: DHS Foster Care Audit Response 01.29.18			
361	JM Ex. 292: OR SOS DHS Audit – 2019			



362	JM Ex. 293: OR SOS - DHS OR Kids Audit – 02.2020			
363	JM Ex. 294: OR SOS DHS Audit – 07.2020			
364	JM Ex. 295: State Defs – Response to Plf’s Rogs (2 <sup>nd</sup> ) 04.30.21			
365	JM Ex. 296: SFR - Parent Final Report			
366	JM Ex. 297: SFR Edits Highlights & Review			
367	JM Ex. 298: SFR - Hurley Final Report			
368	JM Ex. 299: JM-PROD-0054934 - CH Case File			
369	JM Ex. 300: Parent – Additional Emails			
370	JM Ex. 341: Org Charts – Ayers			
371	JM Ex. 342: CIRT Chapter 413 Division 017			
372	JM Ex. 343: Child Welfare Procedure Manual (excerpt)			
373	JM Ex. 344: DHS 30 Day CIRT (exhibit from Mooney)			
374	JM Ex. 345: Foster Care Safety Team Final Report 2010			
375	JM Ex. 346: 2010.11.22 – Article			
376	JM Ex. 347: 2010.11.27 – Article			
377	JM Ex. 348: 2013.05.01 – Lopez email and Karly’s Law Training			
378	JM Ex. 349: Ayers – Emails			
379	JM Ex. 350: JM Injury Timeline			
380	JM Ex. 351: 2013.12.13 – Interoffice Memo Hunter to Jolin			
381	JM Ex. 352: DAS – Response to Lathen TCN			
382	JM Ex. 353: 2017.09.07 - Article			
383	JM Ex. 356: SB 819 Clip 1 - Senate Comm. on Human Services - 03.13.2017			

384	JM Ex. 357: SB 819 Clip 2 - Senate Comm. on Human Services - 03.13.2017			
385	JM Ex. 358: SB 819 Clip 3 - Senate Comm. on Human Services - 03.13.2017			
386	JM Ex. 359: SB 819 Clip 4 - Senate Comm. on Human Services - 03.13.2017			
387	JM Ex. 371: 04.25.14 Email to George from Lopez			
388	JM Ex. 373: JM et al v Major et al - State Defs' PROD 38 Letter to Pltfs' Counsel			
389	JM Ex. 376: AG 27 - Pearson 05.28.14_Sensitive Issue Report			
390	JM Ex. 378: 285 - Wallins			
391	JM Ex. 379: 425 - Evans - 04.08.15 - Evans Emails			
392	JM Ex. 400: LH Exhibit 031 - 31 - CART Meeting (3.20.17)			
393	JM Ex. 402: 27 - Pearson 05.28.14_Sensitive Issue Report			
394	JM Ex. 419: 239 - Burnell 1.16.15 - Sensitive File Review 7.06.2011			
395	JM Ex. 422: 273 - Hunter 2.10.15 - Mooney Foster Home Sensitive Case Staffing			
396	JM Ex. 423: 274 - Hunter 2.10.15 - Sensitive Case Staffing Notes			
397	JM Ex. 424: 275 - Hunter 2.10.15 - 7.27.11 Rene Duboise e-mail			
398	JM Ex. 429: 361 - Duboise 3.18.15 - Duboise Emails			
399	JM Ex. 430: 440 - Daeschner - 04.09.15 - Daeschner Emails			
400	JM Ex. 431: 451 - Faulkner - 10.22.15			
401	JM Ex. 433: JM-PROD-0223463			
402	JM Ex. 434: JM-PROD-0223599			

403	JM Ex. 436: JM-PROD-0223608			
404	JM Ex. 438: JM-PROD-0223664			
405	JM Ex. 442: Prod 35 - Kwapisz - Hunter			
406	JM Ex. 445: 2018.05.11 - Changes for Oregon's struggling foster care system - oregonlive			
407	JM Ex. 446: 2019.11.30 - Foster care supervisor who drew criticism... - oregonlive			
408	JM Ex. 456: 371 - Kane Suleiman - 3.23.15 - Emails			
409	JM Ex. 457: 425 - Evans - 04.08.15 - Evans Emails			
410	JM Ex. 463: Videotaped Deposition of Dawn E. Hunter, 02.17.15			
411	JM Ex. 464: Declaration of Paulo Jauregui			
412	JM Ex. 466: Declaration of Daniel Wren			
413	JM Ex. 467: Declaration of Anna Dennis, M.S., C.G.C.			
414	JM Ex. 468: Declaration of Ian G. Loewen-Thomas, M.D.			
415	JM Ex. 469: Declaration of Dr. Rose Eagle			
416	JM Ex. 470: Declaration of Tahra Sinks			
417	JM Ex. 471: Declaration of Gail Nosek			
418	JM Ex. 472: Declaration of Lindsay Soto			
419	JM Ex. 473: Declaration of Nina Joanne Hyndman, M.D.			
420	Child Abuse Prevention and Treatment Act (CAPTA) Citizen Review Panels (CRP) Report for the 2022-23 Fiscal Year			
421	2021.01.26 BE Court Report			
422	2022.07.21 BE Screening Report Memo			
423	2023.11.13 Court Memo - SJ			

424	2024.03.01 Preservation of Evidence LTR - SJ			
425	Child X - Dr. Edwinson 11.23.2024 eval			
426	CV - Roxanne Edwinson_March 2024			
427	MindSights_Behavioral Health Liaison Proposal DRAFT			
428	RAPID Sampling Statistics Report 2023.12			
429	Updated RAPID Program Overview_10.2023			
430	2021.01.28 emails re H.A			
431	Emails re Child X			
432	OPB - Oregon is Placing Foster Children in Short-term Rental Homes... - 11.20.2023			
433	OPB - As Oregon Touts Yoga At Out-Of-State Facility for Foster Youth, Utah Cites Mistreatment - 05.16.2019			
434	OPB - As Washington Pulls Foster Kids From Facility, Oregon Children Remain - 06.04.2019			
435	OPB - Guns Drawn On Oregon Foster Care Children in Out-Of-State Facility in April - 05.07.2019			
436	OPB - Oregon Foster Youth Assaulted In Out-Of-State Facility Testifies to Lawmakers - 02.05.2020			
437	OPB - Utah Facility Housing Oregon Foster Youth To Close After Reports Of Abuse - 07.11.2019			
438	Oregonian - Officials-Oregon foster child was assaulted at Utah program - 05.08.2019			
439	Oregonian - Oregon officials say they were overly trusting... - 05.29.2019			
440	Oregonian - Teens riot at Utah facility that houses... - 04.30.2019			
441	7/21/2019 Email exchange between Paul Bellatty, Richard Wexler, Fariborz Pakseresht, et al.	Wyatt_DHS_2259571		

DATED this 12<sup>th</sup> day of April, 2024.

**DAVIS WRIGHT TREMAINE LLP**

By: s/ P. Andrew McStay Jr.

P. Andrew McStay Jr., OSB 033997

andymcstay@dwt.com

William D. Miner, OSB 043636

billminer@dwt.com

560 SW Tenth Avenue, Suite 700

Portland, OR 97205

Tel: (503) 241-2300

**A BETTER CHILDHOOD**

Marcia Robinson Lowry (*pro hac vice*)

mlowry@abetterchildhood.org

Anastasia Benedetto (*pro hac vice*)

abenedetto@abetterchildhood.org

Lindsay Gus (*pro hac vice*)

lgus@abetterchildhood.org

355 Lexington Avenue, Floor 16

New York, NY 10017

Tel: (646) 795-4456

**DISABILITY RIGHTS OREGON**

Emily Cooper, OSB 182254

ecooper@droregon.org

Thomas Stenson, OSB 152894

tstenson@droregon.org

511 SW Tenth Avenue, Suite 200

Portland, OR 97205

Tel: (503) 243-2081

**RIZZO BOSWORTH ERAUT PC**

Mary Skjelset, OSB 075840

mskjelset@rizzopc.com

Steven Rizzo, OSB 840853

srizzo@rizzopc.com

1300 SW Sixth Avenue, Suite 330

Portland, OR 97201

Tel: (503) 229-1819

*Attorneys for Plaintiffs*